

EXHIBIT B

Form of Notice of Removal and Transfer

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

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|---|---|---|
| IN RE: NEW ENGLAND COMPOUNDING PHARMACY, INC. PRODUCTS LIABILITY LITIGATION |) | |
| |) | Docket No. _____ |
| |) | (Related to Docket No. 1:13-md-2419-FDS) |
| |) | |
| |) | |
| |) | NOTICE OF REMOVAL AND TRANSFER |
| |) | PURSUANT TO 28 U.S.C. § 157(b)(5) |
| |) | |
| |) | (Transferred from: [NAME OF STATE |
| |) | COURT AND STATE COURT CASE NO.] |
| |) | |
| IN RE: NEW ENGLAND COMPOUNDING PHARMACY CASES |) | Docket No. _____ |
| |) | (Related to Master Docket No. 12-12052-FDS) |
| |) | |
| |) | |

In accordance with the Opinion and Order issued on **[DATE]** by the Honorable Dennis F. Saylor, IV, Judge, United States District Court for the District of Massachusetts (the “Order”), notice is hereby given as follows:

1. Pursuant to 28 U.S.C. § 157(b)(5), this case is removed and transferred from the [NAME OF STATE COURT], Case No. [STATE COURT CASE NUMBER] (the “State Court Action”) to this Court. (A copy of the Order is attached as Exhibit A.)

2. The Clerk of Court in the State Court Action will be directed to transfer the entire court case filed pertaining to this action to the Clerk of the District of Massachusetts within twenty-one (21) days of filing in the State Court Action of a Notice of Filing of Notice of Removal and Transfer Pursuant to 28 U.S.C. § 157(b)(5).

3. A Notice of Filing of Notice of Removal and Transfer Pursuant to 28 U.S.C. § 157(b)(5) promptly is being filed with the Clerk of Courts in the State Court Action and provided to all parties of record.

For the foregoing reasons, this action is hereby removed and transferred from the
[NAME OF STATE COURT] to this Honorable Court.

Dated: [DATE OF REMOVAL]
[LOCATION]

Respectfully submitted,

[REMOVING COUNSEL]

Attorneys for [REMOVING DEFENDANT]